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April 3, 2008

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*LIMITED TO MATTERS AND PROCEEDINGS
BEFORE FEDERAL COURTS AND AGENCIES

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554

Karen Majcher USAC 2000 L Street, NW Suite 200 Washington, DC 20036

Re: IT&E Overseas, Inc.

Docket 96-45 Supplement to:

Petition for Protective Waiver of Section 54.209 of the Commission's Rules

filed March 25, 2008

Petition for Protective Waiver of Section 54.209 of the Commission's Rules

filed March 28, 2008 and

Petition for Waiver of Sections 54.314, 54.809, and 54.904 of the

Commission's Rules filed March 31, 2008

Dear Ms. Dortch and Ms. Majcher:

IT&E Overseas, Inc. (IT&E), by its attorneys, hereby supplements the above-referenced Petitions for Waiver with the attached affidavit of John M. Borlas, President of IT&E. Mr. Borlas' affidavit details the actions taken by IT&E to ensure that, in the future, all required universal service filings will be filed on time and in accordance with the FCC's rules. Please associate this letter and the attached affidavit with each of the above referenced Petitions.

If you have any questions regarding this matter, please contact me.

Sincerely,

/s/ Mary J. Sisak Benjamin H. Dickens, Jr. Mary J. Sisak

Attorneys for IT&E Overseas, Inc.

Attachment

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CITY OF TAMUNING)	
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GUAM, U.S.A.)	

BEFORE ME, the undersigned authority on this day personally appeared John M. Borlas of IT&E Overseas, Inc., who, on his oath, deposed and said:

My name is John M. Borlas, President of IT&E Overseas, Inc. (IT&E). I am personally familiar with the Federal Universal Service program. I am responsible for IT&E's status as an Eligible Telecommunications Carrier and I am responsible for IT&E's compliance with the requirements of that program.

On March 25, 2008 and March 28, 2008, IT&E filed Petitions for Waiver asking the Commission to accept its ETC Compliance Reports which were required to be filed on October 1, 2006 and October 1, 2007. As detailed in the waiver requests, IT&E was not aware of the requirement to file these reports. On March 31, 2008, IT&E filed a Petition for Waiver asking the Commission to accept its annual Interstate Common Line Support and Interstate Access Support certifications, which were due on June 30, 2007 and its High Cost Support certification, which was due on October 1, 2007. As detailed in the waiver request, IT&E was not aware that filings made by overnight delivery, other than USPS, are required to be sent to the Capitol Heights, Maryland address. In addition, IT&E revised its High Cost Support certification to comply with the Commission's rule that requires a sworn affidavit.

In order to ensure that IT&E complies with all universal service filing dates in the future and that all such filings comply with the Commission's rules, IT&E has put the following procedures in place.

- 1. The ETC Compliance Report, due on October 1 of each year, has been added to IT&E's calendar system tracking all required filings.
- 2. The ETC Compliance Report requirement and the filing procedures for all universal service filings, including the annual High Cost Support, Interstate Common Line Support and Interstate Access Support certifications will be reviewed with the IT&E employee responsible for regulatory filings. This employee will report directly to the President.
- 3. If there is any question concerning the Commission's rules and filing requirements, IT&E's employee responsible for regulatory filings will be instructed to immediately contact IT&E's outside regulatory counsel.

4. IT&E will implement a zero tolerance policy for compliance with FCC rules and regulations. Any violation of an applicable rule will subject the employee responsible for compliance to immediate disciplinary action.

ohn M. Borlas

Sworn to and subscribed before me, the undersigned authority, on this 3^{rd} day of April, 2008.

otary Public

DONNA M PERRON NOTARY PUBLIC In and for Guam, U.S.A. My Commission Expires: April 11, 2009 165 Marata St., #202, Tamuning, Guam 96913